

NOT YET SCHEDULED FOR ORAL ARGUMENT
No. 16-1328 & 16-1396

IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA

PENNSYLVANIA STATE CORRECTIONS OFFICERS ASSOCIATION
Petitioner/Cross-Respondent

v.

NATIONAL LABOR RELATIONS BOARD
Respondent/Cross-Petitioner

ON PETITION FOR REVIEW AND CROSS-PETITION FOR ENFORCEMENT
OF ORDER OF THE NATIONAL LABOR RELATIONS BOARD

PENNSYLVANIA STATE CORRECTIONS OFFICERS ASSOCIATION'S
UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE BRIEF

Pennsylvania State Corrections Officers Association ("PSCOA") respectfully moves for a 10-day extension of time to file its principal brief. If granted, PSCOA's brief would be due on February 2, 2017. The National Labor Relations Board ("NLRB") does not oppose PSCOA's request for an extension of time.

1. The Court entered the brief schedule on December 14, 2016. No party previously has requested an extension of time.

2. Good cause exists for an extension of time. *See* Fed. R. App. P. 26(b). Lead counsel for PSCOA, who will enter his appearance as soon as he secures his admission to this Court, had several collective bargaining agreement negotiations sessions get scheduled next week that are time sensitive. Preparing and participating in such negotiations will require a great deal of preparation and time.

3. Accordingly, PSCOA respectfully requests that the Court grants its request for a 10-day extension to file its principal brief. If this Motion is granted, PSCOA will file its brief no later than February 2, 2016.

Dated: January 13, 2017

Respectfully submitted,

/s/ Edward R. Noonan

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CERTIFICATE OF SERVICE

I, Edward Noonan, counsel for petitioner and a member of the Bar of this Court, certify that on January 13, 2017, I caused a copy of the attached UNOPPOSED MOTION TO EXTEND TIME TO FILE BRIEF to be filed with the Clerk through the Court's electronic filing system. Additionally, true and correct copies were sent this date by First Class, United States Mail, postage pre-paid as follows:

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/s/ Edward R. Noonan
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